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Transmittal Number: 24924259
 Date Processed: 05/16/2022

Notice of Service of Process

Primary Contact: Walgreens Distribution
 Corporation Service Company- Wilmington, DELAWARE
 251 Little Falls Dr
 Wilmington, DE 19808-1674

Entity:	Walgreen Co. Entity ID Number 0501431
Entity Served:	Walgreen Co.
Title of Action:	Sandra Jean Rushing vs. Walgreen Co.
Matter Name/ID:	Sandra Jean Rushing vs. Walgreen Co. (12288550)
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Anoka County District Court, MN
Case/Reference No:	Not Shown
Jurisdiction Served:	Minnesota
Date Served on CSC:	05/13/2022
Answer or Appearance Due:	21 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Schwebel Goetz & Sieben, P.A. 612-377-7777

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To avoid potential delay, please do not send your response to CSC

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**EXHIBIT
A**

Case Type: Personal Injury

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF ANOKA

TENTH JUDICIAL DISTRICT

Sandra Jean Rushing,

Plaintiff,

v.

SUMMONS

Walgreen Co.,

Defendant.

Court File Number:

THIS SUMMONS IS DIRECTED TO: WALGREEN CO.

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.
2. **YOU MUST REPLY WITHIN 21 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this Summons a **written response** called an Answer within 21 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at:

Schwebel Goetz & Sieben
5120 IDS Center
80 S. 8th Street
Minneapolis, MN 55402

3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.
4. **YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not Answer within 21 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not

need to respond. A default judgment can then be entered against you for the relief requested in the Complaint.

5. **LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.**
6. **ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

I hereby acknowledge that sanctions may be awarded pursuant to Minn. Stat. § 549.211.

SCHWEBEL GOETZ & SIEBEN, P.A.

Dated: 5/13/2022

By Jessica Servais
Jessica A. Servais (#387954)
ATTORNEYS FOR THE PLAINTIFF
5120 IDS Center
80 South Eighth Street
Minneapolis, Minnesota 55402-2246
Telephone: 612-377-7777
Fax: 612-333-6311
Email: jservais@schwebel.com

Case Type: Personal Injury

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF ANOKA

TENTH JUDICIAL DISTRICT

Sandra Jean Rushing,

Plaintiff,

v.

COMPLAINT

Walgreen Co.,

Defendant.

Court File Number

Plaintiff Sandra Jean Rushing for her claims for relief, states and alleges that:

I

On December 23, 2019 at approximately 12:53 PM, plaintiff Sandra Jean Rushing was lawfully present on premises owned by Defendant Walgreen Co. located at 1911 S. Ferry St. Anoka, Minnesota 55303.

II

At that time and place, plaintiff Sandra Jean Rushing was caused to slip and fall on ice as a result of the carelessness and negligence of the Defendant in its inspection, maintenance and repair of that area; in its failure to warn of a dangerous condition; in its failure to maintain that area in a condition that was reasonably safe; in its failure to keep the area in a state of reasonable repair; in its failure to keep the area in a condition fit for the use intended; and as a result of other careless and negligent acts and omissions on the part of the Defendant.

III

At all times relevant, defendants possessed a non-delegable duty to keep their premises – including the sidewalk where plaintiff slipped and fell – reasonably safe for entrants like plaintiff.

VI

At all times relevant, defendants possessed a common law duty to keep their premises – including the sidewalk where plaintiff slipped and fell – reasonably safe for entrants like plaintiff.

V

As a result of this slip and fall, plaintiff Sandra Jean Rushing sustained injuries including, but not limited to, a fractured left humerus. She has in the past and will in the future incur medical and hospital expenses for the treatment of her injuries. She has in the past and will in the future incur a loss of earnings and of earning capacity. She has in the past and will in the future suffer great physical and mental pain. Therefore, plaintiff Sandra Jean Rushing has been damaged and injured in an amount greater than Fifty Thousand and no/100 (\$50,000) Dollars.

WHEREFORE, plaintiff Sandra Jean Rushing prays judgment against defendants in an amount greater than Fifty Thousand and no/100 (\$50,000) Dollars, together with interest, costs and disbursements incurred herein.

I hereby acknowledge that sanctions may be awarded pursuant to Minn. Stat. § 549.211.

SCHWEBEL GOETZ & SIEBEN, P.A.

Dated: 5/13/2022

By

Jessica Servais
Jessica A. Servais (#387954)

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